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May 3, 2022

Hon. J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Noel Sanabria, 21-cr-313 (JPO)

Dear Judge Oetken:

I am CJA counsel to Noel Sanabria, a defendant in the above referenced case. I write to respectfully request a one-time modification to Mr. Sanabria's bail conditions to permit him to spend Mother's Day with his family. Pre-Trial Services has indicated that it has no objection to this request and AUSA Rebecca Dell defers to Pre-Trial Services.

Mr. Sanabria is currently on pre-trial release on the following terms and conditions (among others not relevant to the instant application):

\$200,000 personal recognizance bond signed by two FRPs;
secured by \$100,000 cash/property; travel restricted to the
SDNY and EDNY; surrender of travel documents and no
new applications; pretrial supervision as directed by pretrial
services; and home detention with location monitoring.

ECF #15.

Mr. Sanabria has been fully compliant with the terms of his release. He asks the Court that he be permitted to spend Sunday May 8, 2022, Mother's Day, with his family. Specifically, he wishes to be permitted to be outside his home from 11am – 9pm to attend church, have a meal at a restaurant and go to his mother's apartment. All of these activities will take place in either Manhattan, the Bronx or Yonkers. If the application is approved, Mr. Sanabria will provide specifics to his pre-trial services officer.

As noted, Pre-Trial Services has no objection to this request and the government defers to Pre-Trial Services.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

/s/

David S. Greenfield

cc: All Parties (via ECF)
Pre-Trial Services Officer Viosanny Harrison (via email)

Granted.
So ordered.
5/4/2022



J. PAUL OETKEN
United States District Judge